Rymer, Edwina

From: Honker, William

Sent: Tuesday, August 19, 2014 5:45 PM

To: Brown, Jamesr; Dellinger, Philip; Overbay, Michael

Cc: Garcia, David

Subject: RE: Notes from TX RRC visit

Jim – I looked at my notes and the only other thing I had was that the RRC is anticipating more recycling of HF wastewater in the future due to lack of disposal capacity in many areas. They did some rules on recycling 2 years ago.

Also be sure to tell Mike and Phil about the gentleman who has been calling the RRC a lot...

Bill

William K. Honker, P.E. Director, Water Quality Protection Division (6WQ) EPA Region 6 Dallas, TX 214-665-3187

From: Brown, Jamesr

Sent: Tuesday, August 19, 2014 3:00 PM **To:** Dellinger, Philip; Overbay, Michael

Cc: Honker, William

Subject: Notes from TX RRC visit

Here are a few notes and follow up items from yesterday's visit with the TX RRC.

RRC

Gil Bujano, Milton Rister, Craig Pearson (seismologist), David Hill, Peter Pope (and Bill and Jim)

- Well Plugging: Discussed well plugging in the Gulf and the expenses associated with it (\$250K to \$1M +). They
 have about 67 wells in the Gulf that need to be plugged. Asked if we could help with RESTORE Act funding. Bill
 will look into this.
- Class VI Well: Received an inquiry about a sequestration well from an oil and gas operator. No permit application yet. David Hill is the contact if we want to check back later on this, but no action needed at this time.
- Seismic Rules: Dr. Craig Pearson discussed the rules. Public comment period ends Sept. 29. They would like our comments on the proposal (it's on their web site). Looking to finalize it in November time frame. Follow up review by Mike Overbay and GW Center
- Dr. Pearson also mentioned the SMU study on the Azle and looks for an Oct. publication in Nature.
- Pergan Marshall:
 - o There are about 70 commercial disposal permits in the east TX area. No additional permits being issued now.
 - They sent a letter out to commercial disposal well operators in 2012 requesting bottom hole and pressure fall off data.
 - They mentioned they use a threshold of 0.465 psi/ft normal gradient for brine pressure; and can suspend or terminate the permit if pressures exceed 0.465 psi/ft

- They are looking at which of the 70 commercial disposal permits have high pressures. They will send out
 a letter calling for 10% injection pressure reduction and request annual bottom hole pressure and fall off
 pressure data to be sent to the RRC.
- They are telling the operators to proceed with caution.

Other

- The RRC hired 10 new staffers recently. There's much work to be done in reservoir analysis, seismics, recycling, etc.
- Special Projects: (**Mike Vaughn, Grants**) The RRC received limited funding for imaging MIT records which they appreciate, but they requested \$100k for purchasing instrumentation (H2S, TDS, conductivity) for field measurements that was not funded. They would like consideration for purchasing these instruments the next funding opportunity.

That's all I have. Anything else to add Bill?

Thanks, Jim

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